

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>
<b>THIS DOCUMENT RELATES TO:  ETHICON WAVE 1 CASES</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**PLAINTIFFS' MOTION TO EXCEED PAGE LIMITATION**

Plaintiffs respectfully request that the Court afford them leave to exceed the 20-page limitation set forth in Local Rule 7.1(a)(2), as it relates to Plaintiffs' forthcoming Response to Defendant Ethicon's Motion to Exclude the Opinions and Testimony of Dr. Vladimir Iakovlev, M.D. Defendant previously requested an extension of page limitation up to 25 pages for its briefing on this very issue (Exhibit A), which was granted by this Honorable Court on April 20, 2016 (Exhibit B).

As Defendant noted in its motion, because this matter involves a "wave" of many cases, particularly detailed briefs are warranted. Moreover, Defendant argued that unlike other cases, Dr. Iakovlev intends to provide a number of general opinions about a variety of medical devices at issue, including devices used to treat both stress urinary incontinence as well as pelvic organ prolapse. Plaintiffs agree and as support for this motion, Plaintiffs submit that the Defendant did in fact present *Daubert* challenges to many aspects of Dr. Iakovlev's general liability opinions in its motion and supporting memorandum of law.

For all of these reasons, Plaintiffs submit that they have presented good cause for relief from the page limitation requirement and respectfully request that the Court allow them the same relief as was afforded the Defendant – to present up to a 25-page brief as it relates to Dr. Iakovlev’s general opinions.

Respectfully submitted,

/s/Benjamin H. Anderson  
Benjamin H. Anderson (067466)  
ANDERSON LAW OFFICES  
17138 Lorain Avenue, Suite 211  
Cleveland, Ohio 44111  
T: (216) 589-0256  
F: (216) 916-0988  
[Ben@andersonlawoffices.net](mailto:Ben@andersonlawoffices.net)